

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

BANK OF NEW YORK MELLON TRUSTEE.

*

Plaintiff

* Case No: 8:15-cv-01171-PJM

v.

*

NAGARAJ NAGACHANDRA, et al.

*

Defendants

*

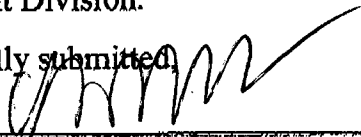
DEFENDANTS' RESPONSE TO STANDING ORDER

COME NOW, defendants Nagachandra Nagaraj, Mysore Nagaraj and Indra K. Nagaraj (collectively "Defendants"), by the undersigned counsel, and state the following in support of removal and in response to the standing Order:

1. On April 22, 2015 the defendants learned that a Motion for Possession was filed.
2. Defendants were never served.
3. All defendants are citizens of Maryland.
4. Plaintiff is a National Bank.
5. The basis for jurisdiction in this matter is a federal question
6. The case was removed within one year after the defendants, became aware of the violations of federal laws.

Defendants respectfully requests that the above-referenced case now pending in the Circuit Court for Montgomery County, Maryland be removed to the United States District Court for the District of Maryland, Greenbelt Division.

Respectfully submitted,



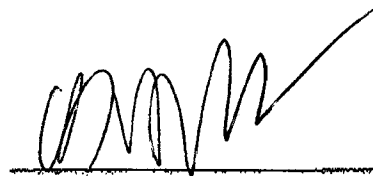
KOS N. JOHNS, Esquire (Attorney for the Defendants)
Bar # 18845
Suite 200, 4848 Battery Ln, Bethesda, MD 20814
Phone: (301)656-0787 Fax: 301-718-3576

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this, the 4 day of May, 2015, that a copy of the Defendants respond to the Notice of Removal was mailed, postage prepaid, First Class Mail, to Bank Of New York Trustee, 7105 Corporate Dr Plano Texas, 75024.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this, the 4 day of May, 2015, that a copy of the Defendants respond to the Notice of Removal was mailed, postage prepaid, First Class Mail, to E. Edward Farnsworth Jr., Esquire 5040 Corporate Woods, Suite 120, Virginia Beach, VA 23462.

A handwritten signature in black ink, consisting of several loops and a long, sweeping diagonal stroke at the end.

KOS N. JOHNS, Esquire
Suite 200

4848 Battery Ln, Bethesda, MD 20814

Phone: (301)656-0787 Fax: 301-718-3576